

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WARNER RECORDS INC., *et al.*  
Plaintiffs,

v.

ALTICE USA, INC. and CSC HOLDINGS, LLC,  
Defendants.

**Case No. 2:23-cv-576-JRG-RSP**

**JOINT MOTION FOR ENTRY OF AGREED ORDER**

Plaintiffs Warner Records Inc., Atlantic Recording Corporation, Atlantic Records Group LLC, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Fueled by Ramen LLC, Lava Records LLC, Maverick Recording Company, Nonesuch Records Inc., Rhino Entertainment Company, Rhino Entertainment LLC, Roadrunner Records, Inc., Rykodisc, Inc., Warner Music Inc., Warner Music International Services Limited, Warner Music Nashville LLC, Warner Records/QRI Venture, Inc., Sony Music Entertainment, Arista Music, Arista Records, LLC, LaFace Records, LLC, Sony Music Entertainment US Latin LLC, Ultra Records, LLC, Volcano Entertainment III, LLC, Zomba Recording LLC, Warner Chappell Music, Inc., Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Golden West Melodies, Inc., Intersong U.S.A., Inc., Unichappell Music Inc., W Chappell Music Corp., W.C.M. Music Corp., Warner-Tamerlane Publishing Corp., Sony Music Publishing (US) LLC, Colgems-EMI Music Inc., EMI April Music Inc., EMI Blackwood Music Inc., EMI Consortium Music Publishing, Inc., EMI Consortium Songs, Inc., EMI Entertainment World Inc., EMI Gold Horizon Music Corp., EMI

Miller Catalog Inc., EMI Mills Music Inc., EMI Robbins Catalog Inc., EMI U Catalog Inc., EMI UNART Catalog Inc., Famous Music LLC, Jobete Music Co., Inc., Screen Gems-EMI Music Inc., Stone Agate Music, and Stone Diamond Music Corp. (collectively, “Plaintiffs”) and Defendants Altice USA, Inc. and CSC Holdings, LLC (“Defendants” or “Altice”) (collectively “Parties”) hereby move the Court for entry of their agreement regarding Plaintiffs’ demand for Document Categories 77-79, regarding the production of information identifying certain Altice subscribers who were the subject of RIAA or third party copyright notices. The Parties’ agreement is attached to this Joint Motion as an agreed proposed order. Accordingly, the Parties request that the Court enter the agreed order attached to this motion.

Dated: February 10, 2025

Agreed to:

/s/ Jeffrey M. Gould  
w/permission Rudolph Fink IV  
Matthew J. Oppenheim\*  
Jeffrey M. Gould\*  
Corey Miller\*  
Keith Howell\*  
OPPENHEIM & ZEBRAK, LLP  
4530 Wisconsin Avenue, NW, 5th Floor  
Washington, DC 20016  
(202) 480-2999  
matt@oandzlaw.com  
jeff@oandzlaw.com  
corey@oandzlaw.com  
khowell@oandzlaw.com

Alexander Kaplan\*  
Bret Matera\*  
OPPENHEIM & ZEBRAK, LLP  
461 Fifth Avenue, 19th Floor  
New York, NY 10017  
(212) 951-1156  
alex@oandzlaw.com  
bmatera@oandzlaw.com

/s/ Michael S. Elkin  
Michael S. Elkin\*  
Krishnan Padmanabhan\*  
Sean R. Anderson\*  
WINSTON & STRAWN LLP  
200 Park Avenue  
New York, NY 10166  
(212) 294-6700  
melkin@winston.com  
sranderson@winston.com  
kpadmanabhan@winston.com

Jennifer A. Golinveaux  
WINSTON & STRAWN LLP  
101 California Street, 35<sup>th</sup> Floor  
San Francisco, CA 94111  
(415) 591-1506  
jgolinveaux@winston.com

Diana Leiden\*  
Winston & Strawn LLP  
333 South Grand Avenue, 38th Floor  
Los Angeles, CA 90071  
(213) 615-1700

William E. Davis, III  
Texas State Bar No. 24047416  
bdavis@davisfirm.com  
Rudolph “Rudy” Fink IV  
Texas State Bar No. 24082997  
rfink@davisfirm.com  
THE DAVIS FIRM, PC  
213 N. Fredonia Street, Suite 230  
Longview, Texas 75601  
(903) 230-9090  
(903) 230-9661

*Counsel for Plaintiffs*

*\*Pro Hac Vice*

Sean H. Suber\*  
Winston & Strawn LLP  
35 W. Wacker Dr.  
Chicago, IL 60601  
(312) 558-5600

Christopher J. Cariello\*  
ORRICK HERRINGTON & SUTCLIFFE LLP  
51 West 52nd Street  
New York, NY 10019  
(212) 506-5000

Thomas M. Melsheimer  
State Bar No.: 13922550  
Winston & Strawn LLP  
2121 N. Pearl Street, Suite 900  
Dallas, TX 75201  
(314) 453-6500

Mark S. Puzella\*  
R. David Hosp\*  
Sheryl K. Garko\*  
Laura B. Najemy\*  
ORRICK HERRINGTON & SUTCLIFFE LLP  
222 Berkely Street, Suite 2000  
Boston, MA 02116  
(617) 880-1801  
Clement S. Roberts\*  
ORRICK HERRINGTON & SUTCLIFFE LLP  
405 Howard Street  
San Francisco, CA 94015  
(415) 773-5700

Claire Henry  
State Bar No. 24053063  
MILLER FAIR HENRY, PLLC  
1507 Bill Owens Parkway  
Longview, TX 75604  
(903) 757-6400  
claire@millerfairehenry.com  
*Counsel for Defendants Altice USA, Inc. and  
CSC Holdings, LLC*

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document and all attachments thereto are being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this February 10, 2025 on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

Rudolph Fink IV  
Rudolph Fink IV

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is being jointly submitted.

/s/ Rudolph Fink IV  
Rudolph Fink IV